

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VALERIE HUE,)	
)	
Plaintiff,)	Civil Action No. 05-225-KAJ
)	
v.)	
NCO FINANCIAL SYSTEMS, INC., a)	
Delaware corporation, trading as NCO)	
FINANCIAL COMMERCIAL SERVICES,)	
)	
Defendant.)	

PLAINTIFF'S ANSWER TO DEFENDANT'S COUNTERCLAIMS

COMES NOW the Plaintiff, Valerie Hue, through her undersigned counsel and hereby answers defendant's counterclaims as follows:

PRELIMINARY STATEMENT

1. No answer is required.
2. No answer is required.

JURISDICTION AND VENUE

3. Denied that the counterclaims involve occurrences that make up the subject matter of plaintiff's claims and the parties are completely diverse.
4. Denied that the alleged acts and omissions giving rise to these counterclaims took place.

FACTS

5. Admitted only that plaintiff was employed by NCO in Delaware.
6. Denied.
7. Denied.

**COUNT I: VIOLATIONS OF THE IMPLIED COVENANT OF
GOOD FAITH AND FAIR DEALING**

- 8. Denied.
- 9. Denied.
- 10. Denied.

COUNT II: INDEMNIFICATION/UNJUST ENRICHMENT

- 11. Denied.

COUNT III: BREACH OF THE DUTY OF LOYALTY

- 12. Denied.
- 13. Denied.
- 14. Denied.

COUNT IV: INTENTIONAL POLICY VIOLATIONS

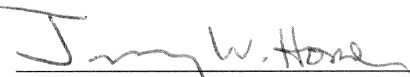
- 15. Denied.
- 16. Denied.

FIRST AFFIRMATIVE DEFENSE

Defendant fails to state a claim upon which relief can be granted. The counterclaim is frivolous, filed in bad faith, and plaintiff is entitled to attorney's fees and costs related to defense of the counterclaims.

PARKOWSKI, GUERKE & SWAYZE, P.A.

By:



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